

## REMARKS

Claims 1, 3, 5 to 7, 11, 14 to 19, and 21 to 32 are pending in the application.

Claims 23 to 26 and 29 to 32 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,442,590 to Inala et al. Claims 1, 3, 5 to 7, 11, 14 to 19, 21, and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,442,590 to Inala et al. in view of U.S. Patent No. 7,133,895 to Lee et al. Claim 27 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,442,590 to Inala et al. Claim 28 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,442,590 to Inala et al. in view of U.S. Patent No. 7,133,895 to Lee et al.

Each of these rejections are again respectfully traversed for the reasons that Inala et al. neither anticipates nor suggests claimed invention and the combination of Inala et al. and Lee et al. fails to teach or otherwise suggest the claimed invention.

These rejections were responded to in the amendment filed September 14, 2007. That amendment was accompanied by the declaration under 37 C.F.R. §1.132 of Dr. Jeremy Sussman, an expert in the computer sciences, who reviewed the subject application and the patents to Inala et al. and Lee et al. and provided his expert opinion as to why the claimed invention is neither anticipated by nor obvious in view of Inala et al. or the combination of Inala et al. and Lee et al. Dr. Sussman noted that a key feature of the disclosed and claimed invention is collaboration spaces (referred to as CollabSpaces by Applicants). Collaboration spaces are associated with one or more Web documents, topics and meta data. Dr. Sussman concluded that "The claims specify that they are related to CollabSpaces, which are wholly different from chat streams (suggested by Inala et al.) and are not suggested by the collaboration processes described by Lee et al., which are not given context from the web pages that the end-user is browsing." In paragraph 6 of his declaration, Dr. Sussman stated in part the following:

"... one of ordinary skill in the art having the qualifications set forth

in paragraph 3 above would not consider it obvious to combine the teachings of the Inala et al. and Lee et al. patents. Inala et al. teaches that a web page can be the complete context for a chat. Lee et al. teaches that a web browser can be used as a mechanism for accessing and participating in collaboration processes. In Inala et al., the context of the collaboration is wholly contained in the web page. In Lee et al., the context is completely separate from the web page, and has its own context. Deciding to combine the context-finding mechanism of Inala et al. with the accessing mechanism of Lee et al. would not be obvious to one of ordinary skill in the art, nor would it result in the claimed invention. Even when presented with the possibility of combining the teachings of Inala et al. with those of Lee et al., the use of other data from the web page (or entire browsing session), as disclosed and claimed in the subject patent application, enhances the Examiner's proposed combination of Inala et al. and Lee et al. and separates that combination from any combination that could result from the combination of Inala et al. and Lee et al. Furthermore, the idea of a CollabSpace, or a collaboration context which may span more than one web page but is related to and indexed by the browsing process is in no way suggested by either Inala et al. or Lee et al., nor the combination of the two. Further, neither of Inala et al. nor Lee et al. allow for mining of data that is part of the invention disclosed and claimed in the subject patent application."

Claim 1 was amended to recite "associating collaboration spaces with one or more Web documents, topics and meta data". Similarly, claim 11 was amended to recite "means for associating collaboration spaces with one or more Web documents, topics and meta data". Claim 23 has similar limitations pertaining to collaboration spaces. The Examiner has taken the position that as to claim 1, the step of "associating collaboration spaces with one or more Web documents, topics and meta data" is suggested by col. 5, lines 40–51, col. 8, lines 49–52 and 62 to col. 9, line 6, and col. 14, lines 58–64. The Examiner has applied the same citation to the limitation in claim 11 of "means for associating collaboration spaces with one or more Web documents, topics and meta data"; however, those citations do not support the Examiner's position. The citations are reproduced below:

Column 5, lines 40–51:

“Server architecture 15 is an example of service architecture in an embodiment of the present invention, and provides means for identifying and monitoring client parameters, enabling multiparty chat-session connections between clients, and provides in some embodiments streamed ads to clients logged into chat-sessions. For example, a main Internet service-control server 17 is provided and adapted to identify clients and monitor client parameters related to navigation activity on the Internet. Such navigational activity is URL-specific such that when a client visits a WEB page (URL) it is reported to server 17 according to pre-determined rules.”

Column 8, lines 49–52:

“Extension 37 monitors the client's browsing activity and sends notification of any new URL invoked to server 17, where the client (as a subscriber to the inventive service) is known.”

Column 8, line 62, to Column 9, line 6:

“Once software 37 is invoked as illustrated here, a control panel 41 is displayed. Control panel 41 contains additional control features designed to enable or disable certain chat-related function. For example, a view function enables a client to view the parameters of other clients that are currently engaged in viewing the same WEB page 51. A window 43 in this embodiment is provided to display a list of current clients who are visiting. When the current client invoked the URL for WEB page 51 extension 37 notified server 17, which immediately returned parameters for other clients visiting the same page. It will be apparent to the skilled artisan that control panel 41 may also be, for example, a menu bar.”

Column 14, lines 58–64:

“For example, meta-tags, active-X controls or other embedded modules inserted into WEB pages may be picked up by software 37 and reported to software 39 in server 17, which communicates the instruction to ad server 21 for appropriate deployment of ad content, specific decorum, scripted messages, and the like into any designated chat-session window.”

In making the rejections, the Examiner makes no acknowledgment of Dr. Sussman's Declaration Under Rule 132. Had he read it or read the excerpt above, the Examiner would understand that the chat session of Inala et al. and the collaboration spaces (CollabSpaces) of the subject invention are entirely different. Dr. Sussman

stated in his Declaration that “Inala et al. teaches defining the members of the chat as those currently participating in the chat, whereas the claimed invention allows the membership of a CollabSpace to be defined outside the browsing session (leading to a much richer collaboration process).” Rather than deal directly with the difference, the Examiner states on page 14 of the Office Action the following:

“Applicant’s arguments are directed to the limitation of CollabSpaces, which has not been claimed. CollabSpaces in parenthesis is not interpreted as the limitation collaboration space. Also, CollabSpace appears to be a trade name and should not be used in the claims.”

The Examiner’s statements are entirely in error. First of all, the term CollabSpaces is defined in the specification. See, for example, page 3, lines 14–16. Moreover, it is well settled law that the inventors may be their own lexicographers. The term “CollabSpaces” is not a trade name and, with the supporting definition in the specification, it is properly used in the claims.

To further buttress Applicants’ position, there is submitted herewith the Declaration Under 37 C.F.R. §1.132 of Jenny Li, one of the inventors of the subject patent application. Ms. Li is and expert in the arts of Computer Science, as evidenced by her education, experience and publications and patents, and her opinion, like that of Dr. Sussman, is entitled to evidentiary weight. In her declaration, Ms. Li makes reference to the specification by paragraph number as appears in the publication of this application as Pub. No. 2005/0114789 published on May 26, 2005. Ms. Li clearly defines “collaboration spaces”, providing citations to the specification and relating these to the recited limitations of the claims. It is abundantly evident from prior arguments presented in the prosecution of this application and the supporting declarations of Dr. Sussman and Ms. Li that Inala et al. do not teach defining collaboration spaces, which are in no way equivalent to a chat session. Furthermore, Inala et al. do not “mine” browsed content to determine related collaboration spaces, as required by each of the independent claims. The Examiner is therefore respectfully requested to consider both Dr. Sussman’s and Ms. Li’s Declarations Under 37 C.F.R.

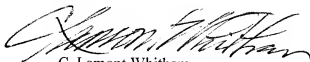
§1.132 in his reconsideration of this application.

In view of the foregoing, it is respectfully requested that the application be reconsidered, that claims 1, 3, 5 to 7, 11, 14 to 19, and 21 to 32 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Lamont Whitham", is written over a horizontal line.

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S.N. 10/718,541

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of

Hung-Yang Chang et al.

Serial No. 10/718,541

Filed November 24, 2003

For METHOD AND SYSTEM FOR  
COLLABORATIVE WEB BROWSING

Confirmation No. 1270

Group Art Unit 2179

Examiner Kim Lynn Dam

Box Non-Fee Amendment  
Commissioner for Patents  
PO Box 1450  
Alexandria, Virginia 22313-1450

DECLARATION UNDER 37 C.F.R. §1.132  
JENNY LI

Jenny Li declares as follows:

I received a degree of Bachelor of Science in Computing Science from University of Alberta, Alberta, Canada, in 1995, a degree of Master of Science in Industrial and Applied Mathematics from Rochester Institute of Technology, Rochester, NY in 1998. Before receiving my Master of Science degree, I have been employed by the International Business Machine Corporation at Thomas J. Watson Research Center from May 1997 to August 2003. I was a Software Engineer. I had these responsibilities:

- Technical team lead for the *People Contextual collaboration Project*. I was a subject matter expert in Contextual Collaboration and technical lead for the architecting solution of the IBM Software Group's Automotive Software Foundry Collaboration offerings. I designed Java J2EE solutions to enable contextual collaboration to be easily integrated into any automotive embedded software development environment. This complemented various on-going IBM efforts on business process management and tool integration, enriching the offerings to IBM customers.
- Technical team lead for the *WebSphere Commerce Business Process Integration Project*. I created a Pre-Sales web services business flow enterprise solution for WebSphere Commerce software to extend its cross-

application integration capability. This solution improved existing B2B connectivity technologies, enhanced customization for WebSphere Commerce, and offered IBM Marketing Team solutions to solve individual customer's need.

- Technical team lead for the *WebSphere Commerce Suite Collaboration Project*. I had dual responsibilities as an architect and product project team lead in leading a remote team from IBM Software Group Toronto in the product development and integration phase for the IBM WebSphere Commerce Business Edition (WCBE) Version 5.4 Software Collaboration component. WCBE is the first e-Commerce Software in the industry to bring dynamic collaboration and virtual teaming to the B2B environment, allows buyers and suppliers to negotiate terms and discuss the specifics of an order real-time. I contributed to the formulation of the strategy and execution plan for the WCBE Reference Architecture, which has generated or impacted more than \$15M of revenue for the IBM Software Group division.
- Technical team lead for the *Virtual Corporation Management System (VCMS) Project*. I architected the CollabManager subsystem that integrated Lotus Domino technology to VCMS to provide asynchronous collaboration between buyers and vendors in RFQ business. The project was a prototype for the Agile Web Technologies, which was later productized to be a product called VCMS.
- Data Architect for the *Transportation Logistic Workbench Project*. I was a technical lead for the solution architecture of a 3-tier client and server base infrastructure, a forecasting module and database tools in a distributed transportation logistics decision support application for Tesco, a UK grocery retailer. This was part of IBM's TransConnect solution suite. It contributed to \$13M of IBM's revenue.

From August 2003 to November 2004, I was an enterprise architect in the Worldwide Finance IT Architecture and Strategy team, IBM Headquarters. My responsibilities included:

- Provided strategic technology guidance and best practices to Finance Division, help IBM execute worldwide on demand initiative, suggest system or application convergence strategies. Projects included performing strategic architecture for internal IBM Finance Portal ([w3.ibm.com/finance](http://w3.ibm.com/finance)), architected Service Oriented Architecture solutions to integrate legacy applications with new technologies to satisfy dynamic business requirements and minimize time required to integrate cross-platform enterprise applications, re-engineering Treasury Bank Relations backend MVS/VM systems, estimating impact of open standards/open clients for Finance, constructing offerings for new internal web hosting environment to cut costs and meet on

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demand needs, providing guidance for business application owners for application migration, updating Finance Blueprint to reflect current and strategic system architecture for Corporate Functions.

- Performed architecture reviews for internal Finance web applications. Managed software end of life.

From December 2004 to present, I have been a lead IT architect (IBM certified, Open Group certified, ITIL certified) in the Center for Solution Integration (CSI), IBM System and Technology Group. My responsibilities included:

- Collaborate with various organizations and/or business partners in designing infrastructure and business solution architecture for various industry sectors, including Quality Insight Early Warning and Telematics solutions for the automotive sector, Integrated Border Management for the government sector, Digital Video Surveillance solutions for cross-sectors, Information Lifecycle Management for Email Archival and Retention for cross-sectors, Financial Payment solution, etc. Enhanced industry solutions by mapping the existing demo or proof of concept solutions into production-like environments and leveraged the right hardware, operating systems and middleware, high availabilities and/or other non-functional capabilities. Contributed to various IBM solution offerings including the automotive and information lifecycle management arenas. Contributed to the IBM Redbook for the Government Passenger Risk Management, that generated \$185M for customer win. The Digital Video Surveillance reference architecture that I created contributed to the big win at Wal-Mart including \$19M for IBM and \$4M for NetApps.
- I am also the chair of the IBM Solution Community that consists of members from various solution centers. I foster a collaborative environment that allows teamwork and assets reuse among the participated solution centers.

Attached to this declaration is a list of publications and patents in which I am named author, co-author or co-inventor.

I have read and understood the above identified patent application, which I am named as a co-inventor. I have read and understood U.S. Patent No. 6,442,590 to Inala et al. relied on by the Examiner. In our patent application, we defined collaboration spaces. Collaboration spaces are different from chat sessions.

- Collaboration spaces are explicitly created on an administrative console and can also be edited. It is mentioned our application paragraph [0041] that "an administration console" allows "user to create, delete, edit, various Collabspace.". On the contrary, chat sessions are formed by users joining a conversation and may not be edited by a third party. In paragraph [0041] of our application, we stated that "the ManageSpaceServlet 710 is invoked when a user selects the Manage Collab Spaces button 24 in FIG.2, and is used to display an administration console for the user to create, edit, various Collabspace." We also reinforced this argument as we mentioned in claim 1



that "collaborative web browsing, comprising the steps of: defining a collaboration toolbar and displaying the collaboration toolbar on a user interface (UI), the collaboration toolbar including a user UI component to logon/logoff, manage collaboration spaces". In addition, our claim 6 extends claim 1 states that collaborative Web Browsing "further comprising the step of allowing a user to instantiate collaboration operations from the collaboration co-browser." Our claim 23 states that "collaborative Web browsing" comprises "a collaboration toolbar". Our claim 26 that extends claim 23 states that "collaboration toolbar of the augmented browser hosts command buttons to retrieve, manage contextual collaboration spaces and command buttons for authentication and configuration."

- A collaboration space simply defines the members that have a need to collaborate with each other. Members in a collaboration space may or may not be chatting. In paragraph [0026] of our application, we stated that "Once logged in, the user will appear as a passive collaboration member for other members of a contextual collaboration space. The user is expected to enable the toolbar for retrieving the computed context sensitive collaborations based on the browsing experience." That stated very clearly that members of a collaboration space can enjoy the collaboration experience that is beyond plain chatting as they can enjoy receiving context sensitive resource that is mined by the collaboration space on their browsing experience. However, people in a chat session are always chatting with each other. Our argument is claimed in claim 18 that extends claim 1 states that "collaboration operations including sending email, instant messaging, creating new discussion threads, and posting and responding to discussion."
- A collaboration space also includes a list of discussion threads, which are samples of Web documents or topics, are mentioned in paragraph [0012] and also figure 5 of our application. A chat session does not include such. Claim 1 of our application recites "associating collaboration spaces with one or more Web documents, topics and meta data". Claim 11 of our application further reinforce this argument by reciting that "collaborative Web browsing, comprising: ... means for defining collaboration spaces which comprise collaboration members and discussion chains". Our claim 29 extends claim 23 states in details that "the collaboration explorer bar ...displayed as a window that includes a members pane, which list current collaborating members, a discussion pane, which lists discussion chains in a collaboration permitting a collaboration member to post and respond to discussion or create new discussion threads."

With regards to the Inala patent, our patent application is different from Inala's patent:

- Inala does not teach defining collaboration spaces. It simply lists people who are viewing the same web page at the same time to facilitate them chatting among themselves. It does not include discussion chains (which are samples of web documents) or other types of collaboration.

- o We claimed in 1 that "collaborative Web Browsing, comprising the steps of: defining collaboration spaces which comprise collaboration members and discussion chains; associating collaboration spaces with one or more Web documents, topics and meta data". Our claim 6 extends claim 1 states that "the step of allowing a user to instantiate collaboration operations from the collaboration co-browser", where collaboration operations were further discussed in details in our claim 18 that "collaboration operation include sending email, instant messaging, creating new discussion threads, and posting and responding to discussions". Our claim 25 extends claim 23 states that "the collaboration server component further includes a collaboration manager communicating with the collaboration explorer bar of the augmented browser and which provides a mechanism to interact with various collaboration modalities, including instant messaging, team rooms, and e-meetings."
- o The richness of collaboration spaces that we described here is reinforced by Dr. Jeremy Sussman in his declaration. On page 4 of Dr. Sussman's declaration, he said "Claim 25 (of our application) extends claim 23 to bring in other, more rich collaboration types to the CollabSpace." On page 5 of his declaration, he concluded that "the Examiner is in error in rejecting claim 23 to 26 and 29 to 32 as being anticipated by Inala et al. Inala et al. does not anticipate or suggest the claimed invention because Inala et al. is based on the presumption that the complete context for the chat session is contained in the page being visited... Furthermore, the idea that other collaborative processes besides a directed chat about this page is not suggested or anticipated by Inala et al." On page 5, Dr. Sussman also stated that "The combination of Inala et al, and Lee et al. fail to suggest the claimed invention as recited in claims 1, 3, to 8, 10, 11 and 14 to 22. More particularly, whereas Inala et al. teaches using web pages to define chat streams and Lee et al. teach using a web browser to log into a collaboration server, the combination of these two references misses the concept of using the information contained within the page, or with the users' history, or with meta data in the web page, or any other nontrivial information to discover collaboration processes. The claims specify that they are related to CollabSpaces, which are wholly different from chat streams (suggested by Inala et al.) and are not suggested by the collaboration processes described by Lee et al." On page 6 of Dr. Sussman's declaration, he reinforced the idea of a collaboration space by saying "the idea of a CollabSpace, or a collaboration context which may span more than one web page but is related to and indexed by the browsing process is in no way suggested by either Inala et al. or Lee et al. nor the combination of the two."
- Inala does not list related collaboration spaces. Inala allows related chat sessions to be searched for. But chat sessions are not collaboration spaces as

we mentioned above, and searching, initiated by users, is different from listing, which is initiated by the system. In our application, we show the content of the current collaboration space, and also list the related collaboration spaces. In claim 1 of our application, we stated that "the collaboration toolbar including a user UI component to login/logout, manager collaboration spaces, list related collaboration spaces, and list related link". This is also further illustrated clearly in figure 5 that shows a pull-down menu which lists related collaboration spaces.

- Inala describe chat sessions where all users in the chat sessions have one role. In our applications, members of a collaboration space can be of various roles. Our claim 32 extends claim 23 states that "the collaboration server component includes a security module that identifies users and classifies those users as various role players in the system." This is also agreed with Dr. Sussman's declaration on page 3 as he states that Inala et al. "allow only for a single role, that a person contributing to the chat stream".
- We maintain the relationships between collaboration elements that are not found in Inala's application. Our claim 23 recites "the collaboration server including a view generator used to assemble together collaboration elements ... maintains relationships between collaboration elements and provide a mechanism to inference relationships between collaboration elements."
- Inala does not "mine" browsed content to determine related collaboration spaces. In paragraph [0043] of our application details how the miner is implemented using a classifier.
  - The concept of "a mining component to mine the monitored browser content, URL (Universal Resource Locator), and meta data to determine related collaboration spaces" is claimed in our application claims number 1, 11, and 23. In particular, our claim 23 defined the details of "mining" as the "collaborative Web browsing, comprising: an augmented browser comprising an Internet browser, a collaboration toolbar, a collaboration explorer bar, a monitor, and a classifier provided with a miner plug-in, the Internet browser populates with Web sites and notifies the monitor when new documents arrive, the monitor, in turn, attempts to classify the newly loaded content using the classifier, the classifier uses the content, URL (Universal Resource Locator) or meta data associated with the loaded page and passes this information to the miner plug-in in order to identify content to determine page, topic or meta data content, the monitor then attempts to discover related collaboration spaces (CollabSpaces), URL links, and role players that might be helpful to the loaded content in the Internet browser, once the monitor has completed classifying the content and collecting the related collaboration context, the monitor instructs the toolbar and the explorer bar to populate with corresponding collaborative elements that are related to a current browsing context".

- o Dr. Sussman's declaration further reinforced that Inala et al. does not "mine" browsed content as he stated on page 5 of his declaration that "Inala et al is based on the presumption that the complete context for the chat session is contained in the page being visited. The leap from this assumption to one in which less obvious data, e.g., meta data, page content, other related activities in which the user is involved, etc., is not obvious, nor is it suggested by Inala et al." On page 6 of his declaration, Dr. Sussman declared that "neither of Inala et al. nor Lee et al. allow for mining of data that is part of this invention disclosed and claimed in the subject patent application."

Inala only uses chat subjects, Web page URLs etc as search parameter, it does not perform any mining (i.e., analysis of such data). Dr. Sussman agreed with our argument and he reinforced it in his declaration as he said on page 4 of his declaration that our application "Specifically, claim 23 specifies that there be a classifier which uses the topic, content, and meta data to discover related CollabSpaces, and a server which uses this assembled data to manage CollabSpaces. Inala et al. rely solely on URL information, not the other elements mentioned in this claim, and does not manage CollabSpaces but rather chat streams, which are not as rich. Claim 24 builds on claim 23 to include mining data (that is, finding patterns not readily apparent in the surface data mentioned in claim 23. Claim 25 extends claim 23 to bring in other, more rich collaboration types to the CollabSpace. Claim 26 extends claim 23 to include authentication and authorization."

- Inala does not "render" other chat sessions, but only allows users to search for them. Our application renders a related collaboration space by listing the members and discussion chains that make up the collaboration space. Our argument is claimed in claim 7 of our application that "the collaboration co-browser a Web browser and displaying collaboration elements of an appropriate collaboration space corresponding to the user's monitored browsing activity."

Based on the argument listed above, our patent application is very different from the Inala patent. We teach a concept called collaboration space (equivalent to CollabSpace, a short terminology we used) which does not exist in Inala patent. In our patent application, we identified sample components in a collaboration space, and demonstrated how an end user can manage a collaboration space, or how the system can mine the web page that a user is reading by finding a relevant collaboration space that it relates to, and then it renders the collaboration space automatically for the user.

Furthermore, the concept of collaboration space was mentioned in the cross referenced U.S. patent applications number US20050060371A1 and US20070294348A1, and the patent number ZL200410077008.4 was issued by China on Aug 1, 2007 with the same title "Method and System for Providing a Common Collaboration Framework Accessible From Within Multiple Application", and I was

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a co-inventor of these and the applications were filed at the same time back in September 15, 2003 as this identified patent application.

In response to Office Action where the patent examiner states on page 14, numbered paragraph 11 that "Applicant's arguments are directed to the limitation of CollabSpaces, which has not been claimed", the term "CollabSpaces" is the short term we used for collaboration spaces. These two terms that we defined are equivalent.

- We stated very clearly in our application in paragraph [0025] that "there is a synchronize button 22 which is used to refresh the list of current contextual Collaboration Spaces, here referred to as CollabSpaces.", and on paragraph [0011] that "a collaboration co-browser (referred to as an explorer bar hereinafter) which displays a collaboration space, called CollabSpace".
- We mentioned in the cross referenced US patent applications number US20050060371A1 and the granted Chinese patent ZL200410077008.4, and US20070294348A1, which I was a co-inventor. In paragraph [0025] of US20050060371A1 and ZL200410077008.4, paragraph [0026] of US20070294348A1, we mentioned that "This infrastructure makes collaboration spaces 'CollabSpaces' 10 available across multiple applications 20 that can be accessed from within the application's native user interface."

These statements showed very clearly that collaboration spaces and CollabSpaces are equivalent, they are the same thing.

Furthermore, the concept of CollabSpace (i.e., collaboration space) is defined in the following which further confirmed CollabSpace is a short term for collaboration space and they are the same thing:

- In paragraph [0025] of US20050060371A1 and the granted patent ZL200410077008.4, and paragraph [0026] of US20070294348A1 stated that "A CollabSpace 10 represents an aggregation of various collaboration modality instances (different modes of collaboration) associated with a business context."
- Collaboration space was defined on page 1 paragraph [0005] of US20050060371A1 and granted patent ZL200410077008.4, and paragraph [0006] of US20070294348A1 that "The collaboration spaces contain one of more collaboration elements that have potentially different collaboration modalities." In paragraph [0009] stated that "At least one collaboration space supports different modes of collaboration, wherein the users collaborate through the different applications using the different modes of collaboration maintained in the collaboration space."

Therefore, in our response to the patent examiner's above argument, the definition of collaboration spaces, and CollabSpaces stated in our patent application and the cross-referenced US patent applications and Chinese patent are consistently showing that CollabSpace and collaboration space are the same, CollabSpaces is a short term we used for collaboration spaces and they are therefore equivalent.

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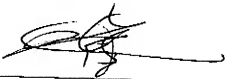
Dr. Jeremy Sussman's declaration mentioned about the concept of CollabSpace we defined, which is equivalent to the collaboration spaces. He stated very clearly how CollabSpace (which is the same as collaboration space) in our application differs from the referenced Inala's application that the examiner has been comparing to. Inala's scope of collaboration is limited, and it does not mention the richness of collaboration as the way we defined what a collaboration space (CollabSpace) is. This argument is also supported by Dr. Sussman in his declaration. In particular, Dr. Sussman stated on page 6 of his declaration that "the idea of a CollabSpace, is in no way suggested by Inala et al. or Lee et al., nor the combination of the two. Further, neither of Inala et al. nor Lee et al. allow for mining of data that is part of the invention disclosed and claimed in the subject patent application."

In response to Office Action where the patent examiner states on page 14, numbered paragraph 11 that "Applicant's arguments are directed to the limitation of CollabSpaces ... Also, CollabSpace appears to be a trade name and should not be used in the claims", I do not agree with the patent examiner's argument here. CollabSpace or collaboration space is a concept we created and defined as I showed in this application, the cross-referenced US applications and the granted Chinese patent mentioned above. CollabSpace is a short term we used for collaboration space, it is a concept. It is not a trade name.

In addition, the patent examiner has mistaken in our claims because we did not use the short term "CollabSpace" in our claims. Therefore the examiner's argument that "CollabSpace appears to be a trade name and should not be used in claims" is invalid. In fact, we spelled out the full terminology by using "collaboration space" or "collaboration spaces" in the claims, the short term "CollabSpace" was never mentioned in the claims.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001 and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Jan 3, 2008



Date

Jenny Li

**Publications:**

"SOA-Trust: Towards Developing Trustworthy RFID Enabled Intelligent Service Solutions", Zongwei Luo, Jenny S. Li, Proceeding of the IEEE International Workshop on Service-Oriented Knowledge, Oct 2007.

"Security Considerations for Mutual Authentication RFID Protocols Deployment", Zongwei Luo, Shijie Zhou, Jenny S. Li, C.J. Tan, Edward C. Wong, Proceedings of the IEEE International Conference on e-Business Engineering, Oct 2007.

"Flexible Middleware Framework for Enabling Next Generation E-Logistics", Zongwei Luo, Jenny S. Li, C.J. Tan, Frank Tong, William Cheung, Jiming Liu, Proceedings of the International Journal of Services Operations and Informatics (IJSOI), 2006.

"Experimental Analysis of an RFID Security Protocol", Zongwei Luo, Terry Chan, Jenny S. Li, Edward Wong, William Cheung, Proceedings of the IEEE International Conference on e-Business Engineering (ICEBE'06) Oct 2006, pp. 62-70.

"Intelligent Middle Service Framework" Zongwei Luo, Jenny S. Li, C.J. Tan, F. C.H. Tong, A. Kwok, E. C. Wong, H.B. Wang, Proceedings of the 2006 IEEE International Conference on Service Operations and Logistics, and Informatics for the IBM Special Sessions, Jun 2006.

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